

Tourtelot Community Advisory Group

250 East L Street
Benicia, CA 94510

October 26, 2001

Via E-mail and U.S. Mail

Mr. Jim Austreng, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Re: Comments on Draft Remedial Action Plan (RAP) and the Draft Environmental Impact Report (EIR) for the Remediation of the Tourtelot Project Site in Benicia, California

Dear Mr. Austreng:

The Tourtelot Community Advisory Group, City of Benicia, has reviewed the Draft Remedial Action Plan (RAP) and the Draft Environmental Impact Report (EIR) for the remediation of the Tourtelot Project Site. We appreciate the willingness of the Department of Toxic Substances Control (DTSC) staff to meet with the Tourtelot Community Advisory Group (CAG), on several occasions, to discuss our questions about the documents. DTSC is to be commended not only for their work on the RAP and EIR, but also for addressing our concerns. Public participation remains an essential part of this project and you have shown by your actions that you are listening to us as representatives of the public.

Our comments on the Draft RAP and EIR reflect our desire to ensure that adequate information is available so the public can understand the proposed project. As we noted in our comments on the RI/FS, it is important that the community have a high degree of confidence in the ultimately selected alternative. Documents that are clear and understandable by the general public are essential to the project's overall credibility. While we generally are convinced that the proposed cleanup action is the best choice overall, we believe our comments reflect parts of the documents that could be improved. We are encouraged by your oral responses to our comments, which have fully addressed our comments. For the record, our comments are stated below.

1. Section 2.3.5 of the Draft EIR discusses the reported discovery in August 2000 of a tail fin assembly on residential property south of the Tourtelot Project Site. The Draft EIR indicates in Section 2.3.7 that DTSC will evaluate the site conceptual model to assess whether ordnance and explosives (OE) were distributed to residential areas outside the Project Site boundary and; if so, DTSC will evaluate risk and determine whether a plan is needed to address off-site areas. Section 2.4 of the Draft RAP also

discusses this additional evaluation. Neither document discusses the DTSC's view of a possible hazardous condition existing off the Tourtelot Project Site. Please clarify that DTSC does not believe significant hazards relating to the former military activities at the Tourtelot Project Site exist in residential areas outside the Site. Include references to the Site Conceptual model and other bases for your position.

A-1
Cont.

2. At the DTSC's public meeting for the Draft EIR and Draft RAP on September 25, 2001, the residents who reported the tail fin also expressed concern that the soil on their property may have been moved from the Dynamite Burn Site on the Tourtelot Project Site during pre-construction grading and could contain explosive chemical residue. Please expand the document to clarify why DTSC does not believe significant hazards from explosive chemical residue exist outside the Project Site.

A-2

3. The following sentence appears in the second paragraph on Page ES-5 of the Draft RAP: "It is not known if the soil transported off site contained OE and/or OE scrap." Please clarify the statement to reference the tail fin found south of the Project Site.

A-3

4. Chapter 4 of the Draft RAP describes the risks posed by OE at the Project Site. The Draft RAP does not clearly state DTSC's conclusion on whether any OE risks will exist following the remedial activities at the Tourtelot Project Site. Please expand on DTSC's risk conclusion based on the current evolution of the Site Conceptual Model.

A-4

5. Mitigation Measure 7-5 in the Draft EIR requires a revegetation plan to mitigate impacts to annual grassland areas on the Project Site. It specifies that the plan will provide for enhancement or restoration of nonnative annual grasslands. Can the plan allow for the possible use of native plants?

A-5

6. Figure 3-1 of the Draft RAP shows geophysical anomalies on the Project Site. There appear to be very dense concentrations of anomalies along Rose Drive, in Unit D-1 and on the McAllister Land Bridge. Is there an explanation for the dense concentrations of anomalies in these locations?

A-6

7. Page ES-11 of the Draft EIR lists five items that are labeled as "areas of controversy". Please explain the use of the phrase "areas of controversy" and clearly state that the project plan as proposed is intended to mitigate them.

A-7

Jim Austreng
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8. The executive summaries of the RAP and EIR must address all major aspects and issues of the project and be clearly written for the public, since most individuals who review these documents would consult the executive summary for the synopsis of information contained within the text. For example, the executive summaries should discuss the Site Conceptual Model and explain what it is and why it is important to this project.

A-8

Thank you for the opportunity to comment. Please let us know if you need further information or clarification of our comments. We look forward to work beginning on the actual cleanup before the end of this year!

Sincerely,



Carey Corbaley
Chair, Tourtelot Community Advisory Group

cc: City Council
City Manager
City Attorney/Project Manager
Bruce Handel
Ed Lowry
Dorothy Rice
Donn Diebert
Roman Rocca
Scott Goldie

Benicia Unified School District

A Partnership For Learning

SUPERINTENDENT:

Joanne Haukland, Ph. D.

GOVERNING BOARD:

Becky Billing
Diane Dooley, M.D.
Don Luce
Reg Page
Rhea Zaks

SCHOOLS:

Benicia High School
*California Distinguished
High School 1992*
*California Distinguished
High School 1996*

Benicia Middle School
*California Distinguished
Middle School 1994*
*National Blue Ribbon
School 1996*

Liberty High School

Joe Henderson Elementary
*California Distinguished
Elementary School 1993*

Mary E. Farmar Elementary
*California Distinguished
Elementary School 2000*

Matthew Turner Elementary

Mills Elementary
*California Distinguished
Elementary School 1995*

Robert Semple Elementary
*California Distinguished
Elementary School 1998*

October 24, 2001

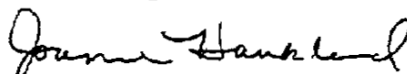
Mr. Jim Austreng, Project Manager
8800 Cal Center Drive
Sacramento, CA 95826-3200

Dear Mr. Austreng:

The purpose of this letter is to respond to a request for comments concerning the Remedial Action Plan and Environmental Impact Report for the Tourtelot Clean-up Project, Benicia, California, and to document the District's understanding with regard to the impacts of Tourtelot clearance and remediation work on the Matthew Turner School site. Work that would require either mandatory or voluntary withdrawal from the Matthew Turner School and grounds will not be conducted during school hours. Matthew Turner School site administration, principal Dan Dempsey, and the Benicia Unified School District Office, Superintendent Joanne Haukland, Ph.D., will be notified prior to any work being done at any other time that might affect people on the school site or on the school facility itself.

With these understandings in place, the Governing Board and the District look forward to the rapid conclusion of the project.

Sincerely,



Joanne Haukland, Ph.D.
Superintendent

cc: Scott Goldie
Pacific Bay Homes

350 East K Street
Benicia, CA 94510
(707) 747-8300
FAX (707) 746-6152

B-1

B-2

444 Mills Drive
Benicia, California 94510
October 28, 2001

LETTER
C

Mr. Jim Austreng, Project Manager
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, Ca 95826-3200

Subject: Comments on the Draft EIR and RAP for Tourtelot Site Remediation

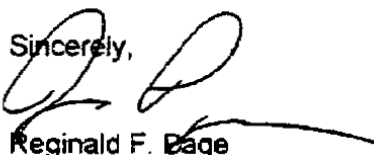
Dear Mr. Austreng:

Thank you for the opportunity to comment on these documents and for the process that DTSC has used to include the public in its review of this project. As a Trustee of the Benicia Unified School District I'd like to comment specifically on the issue regarding the proximity of the Matthew Turner Elementary School to the work site. It is my understanding that the issue of "evacuating" the school will be addressed by scheduling work outside of the times when school children will be present at Matthew Turner, whether the work taking place is within the mandatory or the voluntary withdrawal distance. Moreover, the school and district need to be notified whenever work takes place outside of normal school hours so that appropriate steps can be taken to ensure the safety of district personnel or others who may be at the site during those times.

C-1

C-2

I sincerely appreciate the work that Granite management has done to work with the school district about issues of concern and the district's management may have other comments concerning these documents or the work outlined therein. Certainly, if there is any change that would impact the approach that I have outlined above the school (office of the Principal) as well as the District Office (office of Superintendent) must be notified.

Sincerely,

Reginald F. Bage

Cc: City Attorney
Benicia Unified School District
Mr. Dan Dempsey, Principal -- Matthew Turner Elementary School
Dr. Joanne Haukland - Superintendent